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September 5, 2023

Honorable Katherine Polk Failla
U.S. District Court Judge
Southern District of New York
500 Pearl St,
New York, NY 10007

Re: Joshua Adams vs. 167 Avenue B Associates LLC
Civil Action No.: 1:23-cv-06764-KP
Letter In Response To Defendant's Motion [DE#8]

Dear Honorable Judge Failla,

We represent Plaintiff in the above-styled action.

Pursuant to the Defendants Order [DE#8], the Plaintiff files this letter in response to the Defendant's claims and to provide clarity and a current case status of this civil matter. Just recently, the parties have been in initial communications, with the Plaintiff being in receipt of an email from August 23, 2023, however nowhere within said correspondence was there any mention of a request for an extension of time to file an answer.

While the Plaintiff apologizes for not calling Defendant back any sooner, given his Counsel's indefatigable schedule of recent, the Plaintiff still contends the time was ripe and thereon appropriate to confer with Plaintiff before filing their motion with the Court. In any event, given the present motion, the Plaintiff does not oppose the extension of time as the Parties work further into addressing this matter under Title III of the ADA.

Plaintiff does not believe the extension will affect any other deadlines or events in this case. Thank you for your time and attention to this matter.

Most Respectfully,

BARDUCCI LAW FIRM



PLLC

Maria-Costanza Barducci Esq.

cc: Via CM/ECF Only